

1 A No.
2 Q Or since?
3 A No.
4 Q Now in your work with APC, you were paid in what
5 method, day rate?
6 A Yes.
7 Q That's a question mark. Okay. And your day rate went
8 up a variety of times based upon how long you'd been
9 with the company, is that correct?
10 A I had several pay raises while I was there, that's
11 correct.
12 Q Okay. And your last, I think we established was 475 an
13 hour, correct?
14 A Correct.
15 MR. COVELL: That's a day.
16 MS. ZOBEL: What did I say, an hour?
17 MR. COVELL: I think so.
18 A An hour.
19 Q (By Ms. Zobel) Okay. Did you have a contract with APC
20 Natchiq?
21 A No.
22 Q Now the number of hours that you actually worked per
23 day, did that fluctuate?
24 A Yes.
25 Q Did you have an understanding with the company as to a

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1 minimum number of hours that you were expected to work
2 in exchange for the day rate?

3 A That would have been 12 hours.

4 Q Okay. That was your understanding of the expectation?

5 A Yes.

6 Q Okay. And you've provided us with -- or your counsel
7 did, a series of calendars that are dated and show the
8 dates that you were on the Slope.

9 A Yes.

10 Q Okay. And these are previously then -- I did not mark
11 those as exhibits to this deposition. I just want to
12 confirm some information regarding them.

13 A Okay.

14 Q They are marked, for the record, beginning 0033 and
15 they go through 115 -- 0115. And those records --
16 first of all, is that your handwriting on them?

17 A Yes, it is.

18 Q And did you keep these while you were working there
19 contemporaneous?

20 A Yes, I did. I kept them every day.

21 Q Okay. And why did you do this?

22 A Habit. Same book here.

23 Q Do you do that in your current job?

24 A Yes, I do.

25 Q And these record the number of hours, I'm assuming,

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EXHIBIT B
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